

Benjamin C. Lee (SBN 282177)
blee@jonesday.com
JONES DAY
555 California Street, 26th Floor
San Francisco, CA 94104
Telephone: (415) 626-3939
Facsimile: (415) 875-5700

Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EARLENE OTERO,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.; ET AL.,

Defendants.

Case No. 3:17-cv-00508-EMC

Assigned to: Judge Edward M. Chen

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

On January 31, 2017, Plaintiff Earlene Otero ("Plaintiff") filed a Complaint in this action. Given the large volume of Complaints requiring a response from Defendant Experian Information Solutions, Inc. ("Experian") at the same time, and in accordance with Local Rule 6-1(a), Plaintiff and Experian agree to an extension for Experian to answer or otherwise respond to the Complaint. Experian's response to the Complaint is due April 3, 2017. To the extent that Experian files a motion to dismiss in this case, Experian agrees that Plaintiff shall have 30 days to respond. Experian will thereupon have 21 days for any reply.

Accordingly, IT IS HEREBY STIPULATED by and between Plaintiff and Experian, that the deadline for Experian to answer or otherwise respond to the Complaint is extended until April 3, 2017. Plaintiff's deadline to respond to any motion to dismiss is extended to 30 days from filing, and Experian's deadline to reply in support of a motion to dismiss is extended to 21 days from filing the opposition.

Dated: March 2, 2017

/s/ Elliot W. Gale

Elliot W. Gale (SBN 263326)
SAGARIA LAW, P.C.
2033 Gateway Place, 5th Floor
San Jose, CA 95110
Tele.: (408) 279-2288
Fax: (408) 279-2299
Email: egale@sagarialaw.com

Attorneys for Plaintiff
Earlene Otero

Dated: March 2, 2017

/s/ Benjamin C. Lee

Benjamin C. Lee (SBN 282177)
JONES DAY
555 California Street, 26th Floor
San Francisco, CA 94104
Telephone: (415) 626-3939
Facsimile: (415) 875-5700
Email: blee@jonesday.com

Attorneys for Defendant
Experian Information Solutions, Inc.

ECF CERTIFICATION

I, Benjamin C. Lee, hereby attest pursuant to Local Rule 5-1(i)(3) that the concurrence to the filing of this document has been obtained from each signatory hereto.

Executed on March 2, 2017, at San Francisco, California.

/s/ Benjamin C. Lee

Benjamin C. Lee (SBN 282177)

JONES DAY

Attorneys for Defendant

Experian Information Solutions, Inc.

[~~PROPOSED~~] ORDER

The Court, having considered the parties' Joint Stipulation for Extension of Time to Respond to the Complaint, hereby extends Experian Information Solutions, Inc.'s ("Experian") deadline to answer or otherwise respond to the Complaint to April 3, 2017. Plaintiff's deadline to respond to any motion to dismiss is extended to 30 days from filing, and Experian's deadline to reply in support of a motion to dismiss is extended to 21 days from filing the opposition.

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: 3/6/17

